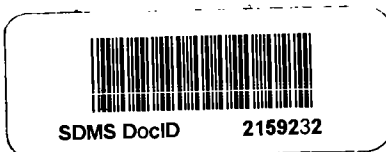


TRONOX

Matthew Paque
Tronox LLC
3301 NW 150th
Oklahoma City, OK 73134



ORIGINAL
405-775-5443
405-775-6570
Matt.paque@tronox.com

April 22, 2010

Ms. Joan Martin Banks (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: January 4, 2010 Request for Information, 68th Street Dump Rosedale, Maryland

Dear Ms. Banks,

Pursuant to and in accordance with the United States Environmental Protection Agency's (EPA's) January 4, 2010 Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Section 104(e) Request for Information ("RFI"), related to the 68th Street Dump in Rosedale, Maryland Tronox LLC (Tronox) hereby submits its response. This response covers all requests.

Tronox's General Objections:

1. Tronox objects to the extent the Requests seek information that is protected by any applicable privilege.
2. Tronox objects to the extent the Requests seek information that is or contains confidential information, including confidential business information.
3. Tronox objects to the extent the Requests seek information that is or contains confidential personal information regarding current or former employees or agents of Tronox.

add to ACMA

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telecon - Mike H.

Baugh Chemical ^{founded 1855} (fertilizer)

1963 ↓

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(oil) See

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Fraudulent Conveyance
lawsuit

4. Tronox objects to the extent the Requests seek information beyond that authorized under CERCLA, including CERCLA § 104(e), 42 U.S.C. § 9604(e).

5. Tronox objects to the extent the Requests seek "any," "any and all," or "all" information and/or documents as over broad, unduly burdensome and costly. Tronox will make a reasonable, good faith inquiry to identify responsive information.

TRONOX RESPONSE TO REQUESTS FOR INFORMATION

Tronox incorporates by reference into each Response to the following Requests its General Objections outlined above.

1. EPA has obtained information during the course of its investigation indicating that the Kerr-McGee Chemical Co. ("Kerr-McGee") may have produced waste, which was disposed of at the Site, and/or disposed of waste at the Site referenced in this letter. Please provide the following information regarding all wastes and by-products produced by Kerr-McGee during the period 1950 to 1969:
 - a. The nature of each "waste" (as the term "waste" is defined in paragraph 6 of the definitions attached hereto) used including its chemical content, characteristics and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDS"). If these analyses are not available for the period 1950 through 1969, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which these wastes were produced that would affect the chemical analyses;
 - b. The annual quantity of each "waste" used and/or generated;
 - c. The process(es) in which each "waste" was used and/or the process(es) that generated each;
 - d. The types of containers used to treat, store and/or dispose of each "waste"; and
 - e. The method of treatment and/or disposal of each "waste".

RESPONSE TO REQUEST NO. 1: After completing a thorough search for any and all documents relating to the above-referenced Site, Tronox has not located any documentation that would indicate Kerr-McGee ever used or disposed of any wastes at the Rosedale, MD Site.

2. Provide the names, titles, areas of responsibility, addresses and telephone numbers of all persons who, during the period 1950 to 1969 may have:
 - a. Disposed of and/or treated "waste" at the Site;
 - b. Arranged for the disposal and/or treatment of "waste" at the Site; and

RESPONSE TO REQUEST NO. 5: After completing a thorough search for documents relating to the Site, Tronox does not possess any documentation that indicates Kerr-McGee ever contracted with or used any of the companies listed in Question 5 to dispose of any wastes at the Rosedale, MD dump site.

- 6. For each and every instance in which Kerr-McGee arranged for disposal and/or treatment of "waste" at the Site identify:**
- a. The characteristics, physical state (i.e., liquid, solid) and chemical composition of each "waste";**
 - b. The persons who supplied them with "waste" material disposed and/or otherwise handled by them;**
 - c. How such "wastes" were used, treated, transported, disposed and/or otherwise handled by them;**
 - d. When and where such "wastes" were used, treated, transported, disposed and/or otherwise handled by them;**
 - e. The quantity (number of loads, gallons, drums) of the "wastes" which were used, treated, transported, disposed and/or otherwise handled by them; and**
 - f. Any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with Kerr-McGee to generate, treat, store, transport and/or dispose of "wastes" at the Site.**

RESPONSE TO REQUEST NO. 6: See Response 5.

- 7. Provide the names, titles and areas of responsibility of all persons, including all present and former employees, who may be knowledgeable of Kerr-McGee's waste disposal practices, whether or not involving disposal at the Site, during the period 1950 to 1969. Include current addresses and dates of birth for former employees.**

RESPONSE TO REQUEST NO. 7: Kerr-McGee maintained extensive operations throughout the U.S. during the time period in question. Because Tronox has been unable to locate any documentation that would indicate Kerr-McGee ever used or disposed of any wastes at the Rosedale, MD Site, the company cannot specifically respond.

- 8. Describe all permits and/or applications and all correspondence between Kerr-McGee and all regulatory agencies regarding "wastes" transported to and/or disposed of at the Site.**

RESPONSE TO REQUEST NO. 8: After completing a thorough search for any and all documents relating to the above-referenced Site, Tronox does not possess any documentation that would indicate Kerr-McGee ever used or disposed of any wastes at the Rosedale, MD Site.

9. Provide copies of all correspondence between Kerr-McGee and all third parties regarding "wastes" transported to and/or disposed of at the Site.

RESPONSE TO REQUEST NO. 9: After completing a thorough search for any and all documents relating to the above-referenced Site, Tronox does not possess any documentation that would indicate Kerr-McGee ever used or disposed of any wastes at the Rosedale, MD Site.

10. Provide the identity of, and copies of all documents relating to, all other persons who generated, treated, stored, transported and/or disposed, or who arranged for the treatment, storage, disposal and/or transportation of such "wastes" to the Site.

RESPONSE TO REQUEST NO. 10: After completing a thorough search for documentation of the above-referenced Site, Tronox has no evidence of ever using the dump site and therefore cannot provide any names of any person that would have knowledge of the Site.

11. If you have any information about other parties who may have information which may assist the Agency in its investigation of the Site and/or who may be responsible for the generation of, transportation to and/or release of contamination at the Site, please provide such information. The information you provide in response to this request should include each party's name, address, type of business and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

RESPONSE TO REQUEST NO. 11: Tronox has no further information at this time.

12. Are you the successor to all liabilities, including those under CERCLA, of Kerr-McGee?

RESPONSE TO REQUEST NO. 12: Kerr-McGee Chemical Worldwide LLC, a Delaware limited liability company, changed its name to Tronox Worldwide LLC by Certificate of Amendment on September 12, 2005.

On January 12, 2009, Tronox and several other subsidiaries filed petitions for relief under Chapter 11 of the United States Code, in the Southern District of New York, *In re: TRONOX INCORPORATED, et al.*, jointly administered under Case No. 09-10156 (ALG) (collectively the "Bankruptcy Case"). Please refer to the filings in that matter for a detailed discussion of Tronox's corporate history.

13. If your answer to question 13 above is "no", describe in detail you and your predecessors' past and current relationship with Kerr-McGee and provide a response to the following:

- a. Did your company or its predecessors sell or otherwise divest itself of any stock, assets, and/or other interest in Kerr-McGee?

- b. If the answer to a is "yes," fully describe the nature of the sale and/or transaction. State if the transaction consisted of a merger, consolidation, sale or transfer of assets, and submit all documents relating to such transaction, including all documents pertaining to any agreements, express or implied, for the purchasing corporation to assume the liabilities of the selling corporation.

RESPONSE TO REQUEST NO. 13: See Response 12.

14. If any of the documents solicited in this Information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

- a. Your document retention policy;
- b. A description of how the records were destroyed (burned, archived, discarded, etc.) and the approximate date of destruction;
- c. A description of the type of information that would have been contained in the documents; and
- d. Name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

RESPONSE TO REQUEST NO. 14: Tronox has found no evidence of ever possessing any documents relating the Rosedale, MD dump site.

15. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.

RESPONSE TO REQUEST NO. 15: Melissa Ellsworth, Paralegal, Tronox, 3301 NW 150th, Oklahoma City, OK 73134. Telephone number: 405 775 6536.

16. For each question, provide the name, title, area of responsibility, current address and telephone number of all persons consulted in the preparation of the answers.

RESPONSE TO REQUEST NO. 16: Matthew Paque, Associate Staff Counsel, Tronox, 3301 NW 150th, Oklahoma City, OK 73134. Telephone number: 405 775 5443.

17. If you have reason to believe that there may be persons able to provide more detailed or complete responses to any questioned contained herein or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons and describe the additional information or documents they may have.

RESPONSE TO REQUEST NO. 17: Tronox does not have any further information.

- 18. For each and every question contained herein, if the information or documents responsive to this Information Request are not in your possession, custody or control, then provide the names, titles, areas of responsibility, current addresses and telephone numbers of the persons from who such information or documents may be obtained.**

RESPONSE TO REQUEST NO. 18: After completing a thorough search for documentation of the above-referenced Site, Tronox has no evidence of ever using the dump site and therefore cannot provide any names of any person that would have knowledge of the Site.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Paque', with a long horizontal stroke extending to the right.

Matthew Paque
Associate Staff Counsel, Tronox

Cc: Michael Foster
Melissa Ellsworth



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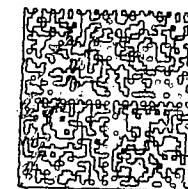
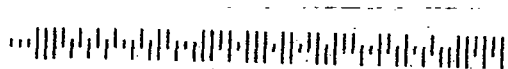
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TRON

P.O. Box 268859
Oklahoma City, OK 73126-8859

Address Correction Requested



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Ms. Joan Martin Banks (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029